

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

KENNETH LEAR, : Case No. 1:20-cv-04660-GHW
Plaintiff, : *Civil Action*
v. :
ROYAL CARIBBEAN CRUISES LTD., : **DEFENDANTS' RULE 12(b)(2) NOTICE
d/b/a ROYAL CARIBBEAN
INTERNATIONAL, GREGORY BROWN,
individually, ROBERT KING, individually,
and GRISEL GARCIA RODRIGUEZ,
individually**
Defendants. : **AMENDED COMPLAINT OR, IN THE
ALTERNATIVE, TRANSFER THE
ACTION**
: **Document Filed Electronically**
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PLEASE TAKE NOTICE that, upon the Declarations of Gregory Brown, Robert Kling, Grisel Garcia Rodriguez and Yamilet Hurtado dated October 23, 2020, and the exhibits annexed thereto, the accompanying Memorandum of Law, and all prior pleadings and proceedings in this action, the undersigned will move this Court before the Honorable Gregory H. Woods, United States District Judge, in the United States District Court for the Southern District of New York, 500 Pearl Street, Courtroom 12C, New York, New York 10007, on a date and time to be determined by the Court, for an order pursuant to Rule 12(b)(2) of the Federal Rules of Civil Procedure dismissing Plaintiff's claims with prejudice or, in the alternative, transferring this action to the U.S. District Court for the Southern District of Florida.

PLEASE TAKE FURTHER NOTICE that Defendant requests oral argument.

Dated: Morristown, New Jersey
November 23, 2020

Respectfully Submitted,

**OGLETREE, DEAKINS, NASH,
SMOAK & STEWART, P.C.**
Attorneys for Defendants

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